BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Amendments to   Docket No. RM2020-7
Rules of Practice

PUBLIC REPRESENTATIVE MOTION
FOR ISSUANCE OF INFORMATION REQUEST

(April 16, 2020)

Pursuant to 39 C.F.R. § 3001.21(a) and 39 C.F.R. § 3007.3(c), the Public Representative requests that an Information Request be issued to obtain additional clarifying data and information from the Postal Service concerning a methodology for updating city carrier cost attribution to account for recent volume trends, labeled as Proposal Two.[1]

The proposed questions seek information that will allow participants to provide comments that are more constructive and evaluate whether the proposal meets the applicable legal and regulatory requirements. Obtaining this information will also contribute to a better understanding of how the Postal Service has interpreted Commission rules and allow the Commission to make a fully informed, reasoned determination on whether Proposal Two meets applicable legal and regulatory requirements, including 39 U.S.C. § 3652(e)(2) and 39 C.F.R. part 3050.

The Public Representative proposes the following questions for the Postal Service.

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[1] Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Two), April 7, 2020. (Petition).

Please refer to the following files:

- **Docket No. RM2020-7, Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Two), "*Prop.Two.Prof.Bradley.Update.Report.pdf*" April 7, 2020, (Bradley Report).**

- **Docket No. ACR2019, United States Postal Service FY 2019 Annual Compliance Report, FY 2019 CRA "B" Workpapers (Public Version), USPS-FY19-32, File: CS06&7-Public-FY19.xlsx, Tab: 7.0.8, December 27, 2019, (CS6&7 FY2019).**

- **Docket No. ACR2019, USPS-FY19-34 - City Carrier Cost System (CCCS) Documentation (Public Version), December 27, 2019, (CCCS2019).[2]**

1. Please confirm that the total regular delivery volume used to calculate the respective shape percentages in the column entitled "CCCS FY19 Proportions," (Bradley Report, Table 2 at 53), is equal to the sum of DPS, FSS, Cased, and Sequenced Mail, and may be obtained from CS6&7 FY2019, *Tab: 7.08*. If you do not confirm, please explain.

2. If you confirm question 1, above, please confirm that this regular delivery volume excludes collection volume retrieved from customer receptacles, small parcel volumes, and large parcel volumes. If you do not confirm, please explain.

3. If you confirm question 2, above, please confirm that files in CCCS2019 can identify some small and/or large parcel volumes as also being Cased, DPS, Sequenced, and/or FSS Mail by using a combination of mailcodes, (bucket) characters, bucket numbers, and/or shape-identifier codes.[3]

   a. Please confirm with respect to each shape. If you do not confirm, please explain.

   b. If you confirm, please explain whether the volumes of small and large parcels in CS6&7 FY2019, which had CCCS2019 Cased, DPS, Sequenced, or FSS Mail

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[2] Please refer to the non-public version if CCCS-related questions can only be answered using the non-public version, USPS-FY19-NP22 - City Carrier Cost System (CCCS) Documentation (Nonpublic Version).

[3] Please refer to the non-public version if CCCS-related questions can only be answered using the non-public version of CCCS FY2019.

Identifiers, were counted as Cased, DPS, and/or FSS Mail in CS6&7 FY2019, *Tab: 7.08*.

4. If you do not confirm question 3b, above, even in part, please estimate the volumes of DPS, FSS, Sequenced Mail, and Cased Mail, which include volumes from small and/or large parcels which also had a regular delivery bucket number, mailcode, bucket character, or shape-identifier, along with the accompanying programs, data files, and documentation needed to reproduce your calculations.

Questions 1 – 4 sought estimates of DPS, FSS, and Cased Mail volumes which added small and/or large parcels with those shape volume identifiers in mentioned in question 4 above, to shape volumes in CS6&7 FY2019, *Tab: 7.08*. Question 5 pertains to the first year after FY 2012, where bucket number, bucket character, mailcode or shape-identifiers in a corresponding fiscal year of the CCCS library reference file(s), were available so that the Postal Service could estimate DPS, FSS, Sequenced, and Cased Mail Volumes from small and/or large parcels.

5. Please estimate the volume of DPS, FSS, Sequenced, and Cased Mail, which includes small and/or large parcels volumes with a DPS, FSS, and/or Cased Mail identifier, and explain whether or not these volumes were added to the shape volumes in CS6&7 *Tab: 7.08,* for the Fiscal Year which corresponds to the Fiscal Year identified in the paragraph above. Please provide the accompanying programs, data files, and documentation needed to reproduce your calculations.

Respectfully submitted,

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